

EXHIBIT K

From: [Sarah R. LaFreniere](#)
To: [Schnapp, Brian](#); [Warren, Zachary](#); [Jhunjhunwala, Trisha](#); [Choi, Sam \(EXTERNAL CONTACT\)](#); [Kerry Klein](#); [Myers, Jonathan R](#); [Brownstein, David \(EXTERNAL CONTACT\)](#); [Knight, Christopher A.](#); [eunice.kim@sidley.com](#); [Nowak, Richard](#); [Schuman, Rachel \(EXTERNAL CONTACT\)](#); [Ellis, Abram J](#); [Marovitz, Andrew S.](#); [Streit, Ryan](#); [Atkins, Alden L.](#); [Jackson, Martin B.](#)
Cc: [Jason Hartley](#); [William Pietragallo II](#); [MDI](#); [Peter St. Tienne Wolff](#)
Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review
Date: Monday, March 22, 2021 6:33:46 PM

Brian,

Thank you for your letter. We have addressed many of the points you raise in our prior correspondence, and write to address a few further matters, and search terms, as indicated below.

During our meet and confer last Friday Defendants asked why Plaintiffs' proposed recall estimate is more robust than Defendants'. In short, Defendants' recall estimate is biased, overstates the number of responsive documents collected, and will not be estimated within +/- 2%.

First, it is biased because it relies on the result of the elusion test to determine how many responsive documents were missed. But the individual reviewing documents for the elusion test knows the prior coding (non-responsive) and is therefore more likely to code documents as non-responsive, deflating the true result of the elusion test. Plaintiffs' proposal includes blind review of samples of both responsive and non-responsive documents, where the reviewer is not told the prior coding. This provides non-biased results.

Second, Defendants' recall estimate presumes that all documents collected are in fact responsive (high precision). This is false. Reviewers will make mistakes and some of the documents collected will be non-responsive. By counting false positives as responsive documents the recall estimate will be inflated. Plaintiffs' proposal eliminates this concern by estimating precision through one of the stratified samples.

Third, your letter suggests that the +/- 2% margin of error used to determine the number of documents for the richness and elusion samples also reflects the margin of error for Defendants' recall estimate. This is incorrect. The margin of error for recall will be much greater because the margins of error are compounded, and because the margin of error fails to account for human error – which will far exceed +/- 2%. Because Plaintiffs' estimation of recall is based on non-biased stratified sampling, and does not rely on an initial richness estimation or elusion test (each of which have their own margins of error), it will result in a far more precise estimate of recall than Defendants' proposal.

Your letter also raises the Broiler Chickens' methodology. The parties in that case agreed that search-term pre-culling would not be applied to a certain number of custodians. Are Defendants willing to agree to apply TAR to the entire collections for certain custodians as was agreed to in that case?

We stand by our prior letters expressing our concerns about Defendants' TAR methodologies, and reiterate our compromise proposal of eliminating Defendants' richness sample and elusion test in

favor of Plaintiffs' stopping criteria and validation methodology, which we understand from Defendants' last letter that they will not adopt.

As to search terms, Plaintiffs propose the following changes based on Defendants' 3/18 proposal. Unless indicated below, we stand by our positions in the spreadsheet circulated on 3/11.

Plaintiffs' 3/11 Term	Defendants' Position	Plaintiffs' 3/19 proposal
(meet* OR discuss* OR consul*) w/10 (cost* OR customer* OR industr* OR pric* OR "market division" OR purchas* OR supply OR capacity OR estimat*)	Strike	(meet* OR discuss* OR consul*) w/10 (cost* OR customer* OR industr* OR pric* OR "market division" OR purchas* OR supply OR capacity OR estimat*)
(meet* OR met OR visit* OR breakfast OR dinner OR lunch OR golf OR drink* OR coffee* OR restaurant OR hotel OR club OR conference OR convention OR discuss* OR communicat* OR conversation OR telco OR teleco* OR phone OR call OR attend* OR participa*) AND (increas* OR inventor* OR market OR OR minutes OR notes OR notic* OR pric* OR produc* OR "record of")	Strike	<p>Plaintiffs propose to split this into two strings, to eliminate the possibility of "Call" AND "Notes" – as follows:</p> <p>(meet* OR met OR visit* OR breakfast OR dinner OR lunch OR golf OR drink* OR coffee* OR restaurant OR hotel OR club OR conference OR convention OR discuss* OR communicat* OR conversation OR telco OR teleco* OR phone OR call OR attend* OR participa*) AND (increas* OR inventor* OR market OR OR minutes OR notes OR notic* OR pric* OR produc* OR "record of")</p> <p>Call AND (increas* OR inventor* OR market OR OR minutes OR notes OR notic* OR pric* OR produc* OR "record of")</p>
(meet* OR met OR visit* OR breakfast OR dinner OR lunch OR golf OR drink* OR coffee*	Strike	Plaintiffs propose to split this into two strings, to eliminate the possibility of

OR restaurant OR hotel OR club OR conference OR convention OR discuss* OR communicat* OR conversation OR telco OR teleco* OR phone OR call OR attend* OR participa*) AND (ROM OR rais* OR report* OR suppl* OR statistic* OR swap* OR WG)		“discuss” AND “report” – as follows: (meet* OR met OR visit* OR breakfast OR dinner OR lunch OR golf OR drink* OR coffee* OR restaurant OR hotel OR club OR conference OR convention OR discuss* OR communicat* OR conversation OR telco OR teleco* OR phone OR call OR attend* OR participa*) AND (ROM OR rais* OR report* OR suppl* OR statistic* OR swap* OR WG) Discuss* AND (ROM OR rais* OR report* OR suppl* OR statistic* OR swap* OR WG)
(meet* OR met OR visit* OR breakfast OR dinner OR lunch OR golf OR drink* OR coffee* OR restaurant OR hotel OR club OR conference OR convention OR discuss* OR communicat* OR conversation OR telco OR teleco* OR phone OR call OR attend* OR participa*) AND [Producers 5]	Strike – duplicative	Agree to strike
(suppl* OR strateg* OR capacity) AND (collu* OR collaborat* OR coopera* OR conspir* OR exchang* OR promis* OR understand* OR “work together”)	Strike	Plaintiffs propose splitting into two strings: (suppl* OR strateg* OR capacity) AND (collu* OR collaborat* OR coopera* OR conspir* OR exchang* OR promis* OR understand* OR “work together”) (suppl* OR strateg* OR capacity) w/12 “work together”

[MDI or TDI 1-3] w/20 (alternat* OR bespoke OR blend* OR categor* OR class* OR commodit* OR customize OR custom OR equivalen* OR equal OR formula* OR fungible OR grade* OR interchang* OR instead)	[MDI or TDI 1-3] w/20 (alternat* OR bespoke OR blend* OR categor* OR class* OR commodit* OR customize OR custom OR equivalen* OR equal OR formula* OR fungible OR grade* OR interchang* OR instead)	Plaintiffs agree to Defendants' proposal
(lead w/3 time) w/25 (pric* OR supply OR cost* OR allocat* OR announc* OR product* OR output)	(lead w/3 time) w/10 (pric* OR supply OR cost* OR allocat* OR announc* OR production* OR output)	(lead w/3 time) w/15 (pric* OR supply OR cost* OR allocat* OR announc* OR production* OR product OR products OR output)
(our OR friend OR contact) w/10 (hear* OR told OR said OR email OR call OR text OR message)	Strike	(our w/2 (friend OR contact)) w/10 (hear* OR told OR said OR email OR call OR text OR message)

Kind regards,
Sarah

Sarah R. LaFreniere

Associate

slafreniere@hausfeld.com

Pronouns: she/her/hers



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From: Schnapp, Brian <bschnapp@velaw.com>

Sent: Monday, March 22, 2021 5:11 PM

To: Sarah R. LaFreniere <slafreniere@hausfeld.com>; Warren, Zachary <ZWarren@wc.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>;

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Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; MDI <mdi@hausfeld.com>; Peter St. Tienne Wolff <PSW@Pietragallo.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Sarah,

Please see the attached response to your March 18 letter.

Best,
Brian

From: Sarah R. LaFreniere <slafreniere@hausfeld.com>

Sent: Thursday, March 18, 2021 8:36 PM

To: Schnapp, Brian <bschnapp@velaw.com>; Warren, Zachary <ZWarren@wc.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Atkins, Alden L. <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; MDI <mdi@hausfeld.com>; Peter St. Tienne Wolff <PSW@Pietragallo.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

[EXTERNAL]

Brian,

Please see attached response regarding TAR methodologies. We look forward to discussing tomorrow.

We have not had a chance to review the search term proposal Zach Warren sent earlier today, and will respond promptly.

Kind regards,
Sarah

Sarah R. LaFreniere
Associate

slafreniere@hausfeld.com

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From: Schnapp, Brian <bschnapp@velaw.com>

Sent: Tuesday, March 16, 2021 9:09 PM

To: Sarah R. LaFreniere <slafreniere@hausfeld.com>; Warren, Zachary <ZWarren@wc.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Atkins, Alden L. <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; MDI <mdi@hausfeld.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Sarah,

Please see the attached correspondence regarding Defendants' TAR methodologies.

In addition, counsel for Huntsman will be following up with a further proposal regarding search terms. In the meantime, we wanted to ask for your availability for a meet and confer regarding search terms and TAR this week. Kindly let us know.

Best,

Brian



From: Sarah R. LaFreniere <slafreniere@hausfeld.com>

Sent: Thursday, March 11, 2021 8:27 PM

To: Warren, Zachary <ZWarren@wc.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>); Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>); Knight, Christopher A. <CKnight@mayerbrown.com>; Eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>); Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Schnapp, Brian <bschnapp@velaw.com>; Atkins, Alden L. <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; MDI <mdi@hausfeld.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

[EXTERNAL]

Counsel,

In advance of our meet and confer tomorrow regarding search terms and TAR, please see attached search term counter-proposal. Plaintiffs provide this proposal without prejudice and subject to the parties reaching agreement on TAR validation measures.

A few explanatory notes about our proposal, in column K:

- Terms in dispute are in purple
- Terms to which Plaintiffs have proposed revisions to are in green
- Terms which Plaintiffs are asking Defendants to run sampling on (for further discussion) are in blue
- Search terms the parties agree on have no color
- We opted to revert to the prior spreadsheet with our earlier positions for convenience.

We look forward to discussing with you tomorrow afternoon.

Kind regards,
Sarah

Sarah R. LaFreniere

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From: Warren, Zachary <ZWarren@wc.com>

Sent: Wednesday, March 10, 2021 9:52 AM

To: Sarah R. LaFreniere <slafreniere@hausfeld.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Schnapp, Brian <bschnapp@velaw.com>; Atkins, Alden (EXTERNAL CONTACT) <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; Megan E. Jones <mjones@hausfeld.com>; Halli Spraggins <hspraggins@hausfeld.com>; MDI <mdi@hausfeld.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Hi Sarah: We're happy to add TAR to the agenda for Friday's call. Will you be sending us anything in advance of the call in an hour? Thanks, Zach

Zachary K. Warren

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From: Sarah R. LaFreniere <slafreniere@hausfeld.com>

Sent: Tuesday, March 09, 2021 7:43 PM

To: Warren, Zachary <ZWarren@wc.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A.

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Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; Megan E. Jones

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Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Zach,

Plaintiffs are ready to discuss both TAR and search terms tomorrow and on Friday. We did not realize that Defendants would not be prepared to discuss TAR on either of our scheduled calls this week. Given the briefing deadline, we're hoping to discuss TAR on Friday's call. Let us know if you can't accommodate that.

We look forward to hearing from you tomorrow on our search questions.

-Sarah

Sarah R. LaFreniere

Associate

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From: Warren, Zachary <ZWarren@wc.com>

Sent: Tuesday, March 9, 2021 6:57 PM

To: Sarah R. LaFreniere <slafreniere@hausfeld.com>; Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Schnapp, Brian <bschnapp@velaw.com>; Atkins, Alden (EXTERNAL CONTACT) <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; Megan E. Jones <mjones@hausfeld.com>; Halli Spraggins <hspraggins@hausfeld.com>; MDI <mdi@hausfeld.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Hi Sarah: Thanks for your email. We'll be prepared to respond to your questions below during our call tomorrow. Per our prior discussions, we understood that tomorrow's call would focus on search terms, so the defense group hasn't yet conferred about the TAR questions. We'll do that tomorrow and then propose some options for a meet-and-confer call to discuss those questions. Thanks, Zach

Zachary K. Warren

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From: Sarah R. LaFreniere <slafreniere@hausfeld.com>

Sent: Tuesday, March 09, 2021 6:23 PM

To: Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Warren, Zachary <ZWarren@wc.com>; Schnapp, Brian <bschnapp@velaw.com>; Atkins, Alden (EXTERNAL CONTACT) <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; Megan E. Jones <mjones@hausfeld.com>; Halli Spraggins <hspraggins@hausfeld.com>; MDI <mdi@hausfeld.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Counsel,

Will you be able to provide us with the information raised on Friday's call, and restated below, in advance of tomorrow's meet and confer? If not, we propose focusing tomorrow's meet and confer on Defendants' TAR methodologies, specifically the matters raised in our February 26 and March 4, 2021 letters, and tabling search term discussions until Friday.

We look forward to discussing tomorrow.

Kind regards,
-Sarah

Sarah R. LaFreniere

Associate

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From: Sarah R. LaFreniere <slafreniere@hausfeld.com>

Sent: Tuesday, March 9, 2021 8:31 AM

To: Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Warren, Zachary <ZWarren@wc.com>; Schnapp, Brian <bschnapp@velaw.com>; Atkins, Alden (EXTERNAL CONTACT <AATkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>

Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; Megan E. Jones <mjones@hausfeld.com>; Halli Spraggins <hspraggins@hausfeld.com>; MDI <mdi@hausfeld.com>

Subject: FW: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Counsel,

To follow up on our meet and confer Friday, Plaintiffs had a handful of questions regarding the scope of Defendants hit reports. As we mentioned, we're asking these preliminary questions to better understand the scope of Defendants' collections. There are a number of unanswered questions from our prior correspondence, and we await your responses to those questions too.

- Do the hit counts include or exclude the DOJ productions? (i.e. is the total number of documents inclusive of any documents already produced to plaintiffs, or were those carved out of the population of documents used to create the hit reports?)
- Were the documents deduplicated across custodians for the purpose of running hit counts?
- Do the hit counts only represent unique documents (as to the total number of hits on the whole collection, not each term) or would a single search term found, say, five times in a single document reflect five hits?
- Do the hit counts include image files – in particular, the image files that sometimes inflate the count of a single email? (e.g. at the bottom of this email are two images that may cause this email to appear as three separate documents in a hit report)

- Have Defendants estimated how many documents will need to be reviewed?
- Have Defendants run TAR on the collection (both with terms and without the terms) to determine a rough estimate of prevalence (i.e. the number of documents TAR is presently designating as likely responsive for the purpose of your review)?
- Have Defendants conducted any sampling on the terms proposed for deletion?

Kind regards,
Sarah

Sarah R. LaFreniere

Associate

slafreniere@hausfeld.com

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From: Sarah R. LaFreniere <slafreniere@hausfeld.com>

Sent: Thursday, March 4, 2021 8:00 PM

To: Jhunjhnuwala, Trisha <tjhunjhnuwala@wc.com>; Choi, Sam (EXTERNAL CONTACT <sam.choi@sidley.com>; Schnapp, Brian <bschnapp@velaw.com>; Kerry Klein <kklein@fbjgk.com>; Myers, Jonathan R <Jonathan.Myers@stblaw.com>; Brownstein, David (EXTERNAL CONTACT <dbrownstein@fbjgk.com>; Knight, Christopher A. <CKnight@mayerbrown.com>; eunice.kim@sidley.com; Nowak, Richard <RNowak@mayerbrown.com>; Schuman, Rachel (EXTERNAL CONTACT <rschuman@paulweiss.com>; Ellis, Abram J <AEllis@stblaw.com>; Marovitz, Andrew S. <AMarovitz@mayerbrown.com>; Streit, Ryan <rstreit@paulweiss.com>; Warren, Zachary <ZWarren@wc.com>; Schnapp, Brian <bschnapp@velaw.com>; Atkins, Alden (EXTERNAL CONTACT <AAtkins@velaw.com>; Jackson, Martin B. <mjackson@sidley.com>; Marovitz, Andrew S.

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Cc: Jason Hartley <hartley@hartleyllp.com>; WP@PIETRAGALLO.com; Megan E. Jones
<mjones@hausfeld.com>; Halli Spraggins <hspraggins@hausfeld.com>; MDI <mdi@hausfeld.com>

Subject: RE: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Counsel,

Please see attached correspondence. Please let us know when you are available to discuss.

Kind regards,
Sarah

Sarah R. LaFreniere

Associate

slafreniere@hausfeld.com

Pronouns: she/her/hers

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From: Halli Spraggins <hspraggins@hausfeld.com>

Sent: Friday, February 26, 2021 6:55 PM

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Subject: In re: Diisocyanates Antitrust Litigation MDL No. 2862 – Technology-Assisted Review

Counsel,

Please see attached letter from Plaintiffs regarding TAR.

Have a great weekend,
Halli

Halli Spraggins

Associate

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